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The Honorable Karen A. Overstreet
Chapter 13
Ex Parte

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE:

PETER D. HACKINEN,

Debtor(s).

PETER D. HACKINEN,

Plaintiffs,

v.

FIRST HORIZON NATIONAL
CORPORATION,

Defendants.

Case No. 09-17051-KAO

Adversary Case No. 09-01341-KAO

DECLARATION BY COUNSEL IN
SUPPORT OF PLAINTIFF'S
MOTION FOR DEFAULT AND
DEFAULT JUDGMENT

I, Christina Latta Henry, declare as follows:

1. I am an attorney admitted to practice before this Court and the attorney
representing the Plaintiff in this case. I have personal knowledge of the facts stated in this
Declaration and am competent to testify to them.

2. In accordance with F.R.B.P 7004, the Plaintiff had the Summons and Complaint
served by Certified Mail on registered agent for the Defendant's corporation: First Horizon

DECLARATION BY COUNSEL IN SUPPORT OF
PLAINTIFF'S MOTION FOR DEFAULT AND DEFAULT
JUDGMENT
(09-17051-KAO) - 1

SEATTLE DEBT LAW, LLC
705 SECOND AVE., SUITE 501
SEATTLE, WASHINGTON 98104
telephone (206) 324-6677
fax (877) 562-5148

1 National Corporation, Clyde A. Billings, Jr., 165 Madison Ave. Memphis, WA 38103. An
2 Affidavit of Service was filed with the Court via ECF on August 12, 2009.

3. More than twenty (20) days have passed since service of the Summons
and Complaint. To date, neither a Notice of Appearance nor an Answer has been filed with the
Court or submitted to Plaintiff by the Defendant.

7 Under penalty of perjury, I declare I have read this statement and to the best of my
8 knowledge believe it is true and correct.

DATED this 16th day of September, 2009.

SEATTLE DEBT LAW, LLC

/s/ Christina Latta Henry
Christina Latta Henry, WSBA 31273
Attorney for Plaintiffs

**DECLARATION BY COUNSEL IN SUPPORT OF
PLAINTIFF'S MOTION FOR DEFAULT AND DEFAULT
JUDGMENT
(ADVERSARY CASE NO.) - 2**

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